

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MICHIGAN STATE A. PHILIP RANDOLPH
INSTITUTE, COMMON CAUSE, MARY LANSDOWN,
ERIN COMARTIN, and DION WILLIAMS,

Plaintiffs,

No. 2:16-cv-11844
Hon. Gershwin Drain

v.

RUTH JOHNSON, in her official
capacity as Michigan Secretary of State,

Defendant.

/

**RULE 26(A)(2)(B) EXPERT REPORT
AND DECLARATION OF DAPHNE W. NTIRI**

I. QUALIFICATIONS OF THE EXPERT

I am currently a Professor, Department of African American Studies, Wayne State University (WSU), a capacity in which I have served for the last 10 years. Before moving to this Department, I spent 20 years in WSU's Interdisciplinary Studies Department that catered to nontraditional students, many of whom were the first in their families to attend college and needed writing remediation in pursuit of their Bachelor's degrees. My work in adult education and adult literacy now spans over 30 years locally, nationally and internationally. I have had the prestigious honor of serving as an invited delegate to the United States House of Congress *Literacy Issue Forum* at the behest of the late Donald

Payne of the 10th Congressional District of New Jersey. My first international assignment was a pre-doctoral opportunity with the International Institute for Labor Studies (IILS) and International Labor Office (ILO) in Geneva, Switzerland, researching labor trends and literacy acquisition patterns of women in Anglophone Africa. This was followed by a three-year consultancy with the United Nations (UNESCO) in field assignments in: a) UNESCO-BREDA in Dakar, Senegal, where I headed the Regional Program for the eradication of illiteracy for two years, and b) UNESCO-Kismayo in Somalia, where I conducted a survey to assess the needs of illiterate rural women and developed a blueprint for a rural college for women of Kismayo in the rural south.

I have been able to connect research, practice and community engagement to benefit the global society. At Wayne State University, with funds from the State of Michigan, the US Department of Education, foundation and donor support to the tune of \$6,000,000, I continue to commit to long-term adult literacy initiatives that train adult education teachers, provide research practice opportunities for undergraduate and graduate students, and equip metro Detroit area functionally illiterate adults seeking a high school diploma or its alternate not only with a diploma but also with increased self-esteem and better appreciation for the world of work. I have served as a Fulbright scholar at the University of Ouagadougou, exploring the literacy of women in low-scale entrepreneurship. I am the author of

over 40 peer-reviewed articles and chapters, and the editor of eight books, the most recent being *Literacy as gendered discourse: Engaging the voices of women in global society* by Information Age Publishing. I have received many awards in recognition of my work, including the WSU *Career Development Chair, Women of Wayne, President's Award for Excellence in Teaching, Arthur Johnson Individual Community Leadership Award, and the Lifetime Achievement Award* from the State of Michigan.

II. PURPOSE AND SUMMARY

I have been retained by Sachs Waldman, co-counsel for the plaintiffs, to provide expert opinion in this case on the subject of literacy. Specifically, I have been asked to present data on the nature and scope of illiteracy and low literacy in Michigan, particularly among African Americans, and to discuss the relationship of low literacy to the long-term systemic and structural educational, socio-cultural and economic inequalities in the United States. In addition, I have been asked to render an opinion on the significance of straight party voting to voters with low literacy skills, and the impact that the elimination of straight party voting would have on their ability to complete both the partisan and nonpartisan sections of the Michigan and Detroit ballots. It is my opinion, as I will describe below, that because of the higher incidence of low literacy, sometimes called functional illiteracy, in the African American population, the elimination of straight party

voting will cause significant difficulty for many African American voters, impacting them to a greater degree than the general population. It will cause them to take more time to vote and will likely cause them to vote for fewer of the positions on the ballot, and thus result in a decrease in their participation in the selection of officials who govern in our democracy.

III. HISTORY OF STRUGGLES FOR EQUAL EDUCATIONAL OPPORTUNITY FOR AFRICAN AMERICANS

Historically, African Americans have been subjected to legal prohibitions regarding the acquisition of education and the quality of the education provided (Ntiri, 2014). The broader civil rights movement was largely an outgrowth of movements to secure a right to education (Ladson-Billings, 2001; Sugrue, 2014). Prior to the Civil War, the slave states prohibited the education of slaves, making it a crime to teach them to read. Following Emancipation and during the Jim Crow era, most southern states either failed altogether to provide education to African Americans or provided only limited, inferior and segregated educational opportunities. Segregated, *de facto* rather than *de jure*, and inferior education was widespread in the northern states as well and remains so to this day. The racial gap in educational opportunity and achievement has remained (Ladson-Billings, 2001). As a result, functional illiteracy continues as a racialized phenomenon in America, particularly in many urban communities where African Americans dwell.

In 1965, the landmark Voting Rights Act was passed in Congress and signed by then President Lyndon B. Johnson. It removed many of the barriers, such as literacy tests, which had been erected to prevent African Americans from voting and participating in civil life. However, the centuries-old deprivation of access to quality education and the ability to participate in the American electorate persists. Today, the experience of prior generations who were prohibited or otherwise prevented from participating both in education and in the voting process has contributed to some apathy among many African Americans as to participation in the electoral process. (For more on: “Voting rates increase with education”, see References)

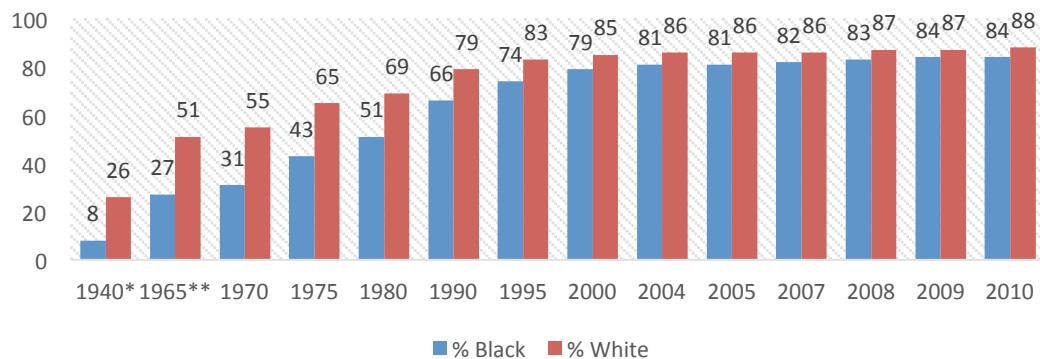
Table 1 presents a 70-year history of educational attainment by race and demonstrates the continuing, albeit diminishing, disparity between African Americans and whites.

Table 1—Educational Attainment by Race; Percent of population 25 years and over, 1940-2010

| High School Graduate or More | % | % |
|------------------------------|-------|-------|
| Year | Black | White |
| 1940* | 08 | 26 |
| 1965** | 27 | 51 |
| 1970 | 31 | 55 |
| 1975 | 43 | 65 |

| | | |
|------|----|----|
| 1980 | 51 | 69 |
| 1990 | 66 | 79 |
| 1995 | 74 | 83 |
| 2000 | 79 | 85 |
| 2004 | 81 | 86 |
| 2005 | 81 | 86 |
| 2007 | 82 | 86 |
| 2008 | 83 | 87 |
| 2009 | 84 | 87 |
| 2010 | 84 | 88 |

Figure 1 - Educational attainment in US (high school graduates) by race: 25 years and over, 1940-2010



Source: United States Census Bureau. (2012). *Educational Attainment by Race and Hispanic Origin: 1940 to 2010* <http://www.census.gov/compendia/statab/2012/tables/12s0229.pdf>

Starting in 2001, data are from the expanded Current Population Survey (CPS) sample and were calculated using population controls based on Census 2000. Data in the column labeled "Black" include Black and other races from 1940 to 1962. From 1963 to 2003, data are for the Black population only. Starting in 2003, respondents could choose more than one race. The race data in this table from 2003 onward represent those respondents who indicated only one racial identity. Beginning with data for 1992, a new question results in different categories than for earlier years. Data shown as 'Completed 4 Years of High School or more' are now collected by the category 'High School Graduate'. Data shown as 'Completed 4 Years of College or more', are now collected by the categories.

IV. LOW LITERACY AND ILLITERACY

The number of adults who are completely illiterate—i.e. completely unable to read and write—is small. Scholars often use the terms low literacy and functional illiteracy interchangeably. However, the more generic term illiteracy, while less accurate, is frequently used. Low literacy among African Americans continues to be one of the most profoundly troubling crises in the United States. Studies conducted over many decades have consistently shown the inextricable link between low literacy and poverty, and the resulting social maladies of family breakdown, lack of stable and adequate housing, criminality, poor public health and low enthusiasm for voting and fuller participation in elections.

In 1973, the Extension Division of the University of Texas launched the Adult Performance Level Study (APL), in which it defined literacy as “skills (reading, writing and computational) and knowledges needed for survival” ((Venezky, Wagner, Ciliberti, 1990, p. xi)). Their findings brought out new and important dimensions to the literacy question by setting new standards to meet the print demands of occupational, civic, community and personal responsibilities. The study reported that 54% of Americans had limited competencies and were marginal in their reading skills (Venezky, Wagner, Ciliberti, 1990).

The term “basic skills” can be used to describe the fundamental requirements of any discipline or function. In the 1973 Adult Performance Level

(APL) survey by the University of Texas, *basic skills* emerged in this breakthrough study and displaced grade-level attainment and school-based curriculum criteria for measuring adult literacy. "Basic skills" became interchangeable with "functional literacy" through the identification of a specific set of utilitarian "survival" skills in the areas of consumer economics, occupational knowledge, health, government and law and community resources (Demetrian, 1999; Ntiri, 2009; Sugrue, 2014). What the APL survey succeeded in accomplishing was to identify a set of competency-based skills for more effective functioning in the society (Ntiri, 2009). The APL survey was a building block for more recent studies like the 1992 NALS survey and the 2003 NAAL survey, which applied similar functional tasks to assess basic skills or literacy. The least literate were considered to be at the lowest level and, thus, were at the basic skills level. According to the NCES (2010), basic skills are more often associated with remedial and developmental education and can be defined as: *Instructional programs that focus on the fundamental knowledge and skills that individuals need to function productively in society* (CIP Code 32).

One of the most salient national surveys on the literacy skills of adults was undertaken by the federal government in 1992, under the National Institute for Literacy (NIFL). This comprehensive survey, the National Adult Literacy Survey (NALS), as it was called, randomly sampled 26,000 persons aged 16 years and

older and provided literacy researchers and advocates with valuable data. This significant effort by the government embraced a more functional, measurable approach to the assessment of literacy. The NALS study assessed adult literacy abilities based on the performance of adults in various everyday tasks, including finding information, making inferences, interpreting tables, addressing civic responsibilities, reading maps and making calculations. The responses, profiled on three literacy scales—prose, document and quantitative, on five proficiency levels (from Level 1 lowest to Level 5 highest)—mark the increasing difficulty and complexity of the associated tasks. The NALS study altered the skill set required for social functioning, as encoded in the National Literacy Act of 1991, with this literacy definition: *the ability to read, write and speak in English and compute and solve problems at levels of proficiency necessary to function on the job and in society, to achieve one's goals and to develop one's knowledge and potential* (National Institute for Literacy, 1991).

Using this definition, the survey revealed that low literacy was widespread in the population as a whole and that it was more prevalent among African Americans, many of whom were reportedly performing largely at Levels 1 and 2 (NIFL, 1998). Adults at Level 1 could not, for example, locate an intersection on a street map or calculate total costs of purchase from an order form. Nearly half the adults in America performed at level 1 or level 2 in basic tasks that included

finding information in newspaper articles or completing forms such as a social security card application (Kirsch, Jungeblut, Jenkins and Kolstad, 1993; Kaestle, 2001). The survey report concluded that between 40 and 44 million U.S. adults performed at the lowest level of proficiency. In other words, between 21% and 23% of the U.S. adult population was functionally illiterate. Relative to whites, African Americans were disproportionately represented in this number. This basic skills gap is a serious challenge to meet the core areas of Michigan's societal needs such as employment, family literacy transmission, earnings, computer usage and civic responsibilities, including voting.

Further, the report noted that adult literacy problems are intergenerational and closely associated with the social problems related to poverty. Intergenerational low literacy among the African American communities in Michigan is well documented (Sugrue, 2014). A disproportionate number of all functionally illiterate adults live in poverty and a higher percentage of that number are African Americans (NIFL, 1998).

Eleven years after the NALS study, another comprehensive survey, the National Assessment of Adult Literacy (NAAL), added a complementary skills-based definition of literacy: *Using printed and written information to function in society, to achieve one's goals, and to develop one's potential and knowledge* (NCES, 2003). This survey added new elements to test differences between adults

who are able to complete relatively challenging tasks and those who are not. The findings corroborated the earlier findings, with no significant literacy improvement reported (NCES, 2003). No further national surveys have been conducted since that date.

Highlights of the NIFL surveys:

- The NAAL (2003) survey corroborates the earlier findings of NALS (1992) that Michigan's functional illiteracy rate hovers around 18%; its major city, Detroit, is reportedly at 47% and other cities with majority African American residents (Benton Harbor, Highland Park and Flint) exceed 47% (NIFL1998).
- In Michigan, we can surmise from the national outcomes that adults with scores at Level 1 and 2 have basic skills that are severely inadequate to function in a technologically advanced society, where reading, writing and financial literacy are necessary to complete everyday tasks.

Additionally, data from the Michigan League for Public Policy (2017) reports that:

- In Michigan at least 9% of working-age adults lack a high school diploma; 1 out of 10 low-income working families has a parent who is not fluent in English; 6 out of 10 community-college students are deficient in reading and writing.

- In Michigan, adults with a high school diploma earn \$26,347 compared to those with an associate or “some college” degree (\$31,460).

234,000 adults in the state of Michigan have limited English proficiency.

Further, US census data point out that there is a 7.3% difference between the high school graduation rates of African Americans (84.1%) and whites (91.4%) in Michigan for the period 2011-2015. ***

(***Source: *US census Educational attainment: 2011-2015 American country survey 5-year estimates*).

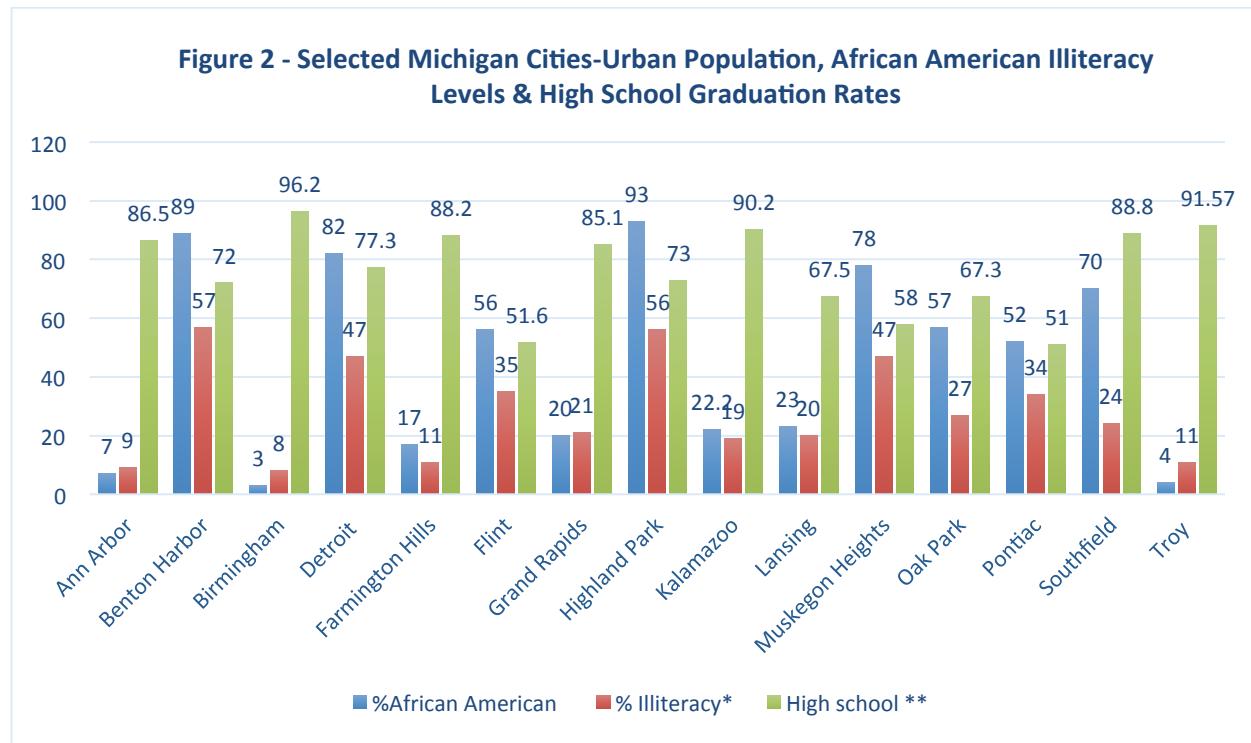
Table 2 - Selected Michigan Cities - Urban Population, African American illiteracy Levels & High School Graduation Rates

| Cities | Population | %African American | % Illiteracy | High school graduation |
|------------------|------------|-------------------|--------------|------------------------|
| Ann Arbor | 113,934 | 7.0 | 9 | 86.5 |
| Benton Harbor | 10,038 | 89.0 | 57 | 72.0 |
| Birmingham | 20,103 | 3.0 | 8 | 96.2 |
| Detroit | 713,777 | 82.0 | 47 | 77.3 |
| Farmington Hills | 79,740 | 17.0 | 11 | 88.2 |
| Flint | 102,434 | 56.0 | 35 | 51.6 |
| Grand Rapids | 188,040 | 20.0 | 21 | 85.1 |
| Highland Park | 11,776 | 93.0 | 56 | 73.0 |
| Kalamazoo | 76,041 | 22.2 | 19 | 90.2 |
| Lansing | 114,297 | 23.0 | 20 | 67.5 |
| Muskegon Heights | 10,856 | 78.0 | 47 | 58.0 |
| Oak Park | 29,319 | 57.0 | 27 | 67.3 |
| Pontiac | 59,515 | 52.0 | 34 | 51.0 |
| Southfield | 71,739 | 70.0 | 24 | 88.8 |
| Troy | 80,980 | 4.0 | 11 | 91.57 |
| | | | | |

Sources: List of counties and cities in Michigan: Population demographics for Michigan 2017 and 2016 <https://suburbanstats.org/population/michigan/list-of-counties-and-cities-in-michigan>

*Literacy data from National Adult Literacy Survey (NALS). *The State of Literacy in America: Estimates at the Local, State and National Levels*. National Institute for Literacy, 1998, Washington DC.

** Michigan School Data: Student counts <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/GraduationDropoutRate2.aspx>



As shown in Table 2 above, there is clearly a direct correlation between the rate of illiteracy in Michigan cities and the size of the African American population. These facts correlate with factors of substandard schooling, economic

and social hardships, and the longstanding racial achievement gap that continues to be of great concern.

Other studies reveal that Michigan ranks 44th in the country in terms of adult basic education achievement (Ruark, 2017). Michigan has more than 221,000 adults aged 25-44 years, who are without a high school diploma or its equivalent. A disproportionate percentage of this number includes African Americans. Michigan was rated at 18% illiteracy in the national survey of 1992; its most populous minority-heavy polling counties of Wayne, Genesee and Muskegon have illiteracy rates of 30%, 21% and 21% respectively (NIFL, 2003). Further, Michigan fares poorly relative to other states in terms of post-secondary education (Michigan Adult Learning Report). Clearly, African Americans in Michigan find themselves in a quandary. They have a history of low literacy skills and missed opportunities. Their livelihood has been shaped by systemic poverty and social injustice.

V. POVERTY, INCOME, EMPLOYMENT AND EDUCATIONAL ACHIEVEMENT

The expert report of Kurt Metzger, appended to the complaint in this matter, provides further details on the literacy disparity evident in the statistics discussed above and the impacts of the disparity. Adult educators such as myself have studied the inextricable link between literacy, income, unemployment and poverty (Ntiri, 2014). Many other scholars have also studied the relationship between

literacy and these economic factors (Ogbu,1990; Michigan League for Public Policy, 2015; Metzger's report, 2016). The variables are closely interwoven and exemplify the tenuous situation in which African American families find themselves. While some scholars (for example see St. Clair, 2003) believe that literacy is the common denominator and the critical instrument to reduce dependency by enhancing self-sufficiency and breaking the cycle of poverty, other functionalist scholars challenge this assertion and view literacy as a socio-economic issue linked to class, gender and race oppression (Ogbu,1990; Metzger's report, 2016; Spangenberg, 2016; Ntiri, 2016).

The data set forth in Metzger's tables speak volumes. The figures on the poverty of African Americans in Michigan in Table 1 (Metzger's report) depict the same patterns of inequality and disparity that are captured in his subsequent tables. Take, for example, the median household income, per capita income and labor force participation rates where there is a consistently large gap between white non-Hispanic and African Americans. For Table 3, the difference in per capita income favors whites by \$10,062. African American labor force participation rates in Table 4 are equally dismal, with a 7-10% gap between white non-Hispanic and African Americans from 2010 to 2013, and a 2-4% improvement for the years 2013 and 2014. Employment, however, has been on the rise for both whites and African Americans. Between 2010 and 2015, the rates of unemployment were

halved for both whites and African Americans but with a steady difference of 13.3% in 2010 to 7.1% in 2015 between the rates for whites and African Americans.

VI. EFFECTS OF ELIMINATION OF STRAIGHT PARTY VOTING

Functionally illiterate persons are frequently ashamed of their lack of reading skills. They are commonly reluctant to acknowledge their reading deficits and very often hesitant to seek help when it is needed. This becomes an especially serious problem in a public setting such as a polling place. When faced with a reading challenge, along with the time pressure experienced with people waiting in lines, the low literate voter is likely to become anxious and frustrated and will be likely to give up rather than finish the daunting task of completing the ballot. All too often such a voter would see himself as being unfit to vote.

The straight party voting option is an effective mechanism for a person with limited reading skills to vote the partisan section of the ballot completely and efficiently. I understand that this option has been available to voters in Michigan since 1896 so that it is entrenched in the minds of Michigan voters, and more so with African-American voters. According to Metzger's report, 75 to 80 % of African American voters use the straight party voting option, compared to only about 50% of total Michigan voters. Without this option, the low literate voter would be faced with the daunting task of struggling through the list of offices,

candidates, and party affiliations. It would take him or her more time; but even as this voter takes more time he or she would be likely to leave some parts of the partisan ballot unmarked.

I understand that the suggestion was made by supporters of the bill in the legislature that eliminating the straight party voting option would make voters more likely to complete the nonpartisan section of the ballot. This suggestion fails to acknowledge the difficulties that many voters, and most particularly those with low literacy and below-basic literacy skills, would experience when confronted with a long ballot requiring greater reading proficiency. As I have stated above, it is far more likely that people with low literacy skills, more of whom are African American, would fail to complete the partisan section of the ballot than that they would finish that section and go on to complete the non-partisan section. In fact, it is my opinion that more voters, regardless of their reading competence, would vote less of the partisan ballot if the straight ticket voting option were removed.

Higher levels of literacy correlate with higher rates of civic engagement. The disproportionate percentage of African Americans with low literacy puts them at a disadvantage in terms of full participation in the voting process. For example, as it was reported in the 2004 Presidential elections, only 39.5% of registered voters with less than a high school diploma voted, compared to 68.9% of registered voters

with post-secondary credentials (State of Michigan: Transforming Michigan's Adult Learning Infrastructure).

Straight party voting enhances fairness in that advantage for reading and comprehending the contents of the ballot is not tilted in favor of voters with more advanced educational attainment. Obviously the ability to vote straight party reduces the time it takes to vote. In addition, straight party voting minimizes the likelihood that voters with low literacy levels will stay away on Election Day. Moreover, straight party voting (unlike the mixed-choices approach), by leveling the playing field between voters with moderate-to-low levels of education and those with advanced academic achievement, ensures that disadvantaged minorities such as African Americans continue to participate in important political, democratic decision-making processes. Clearly, to eliminate straight party voting would undermine the Fourteenth Amendment rights of minority groups such as African Americans.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: June 28, 2017

A handwritten signature in black ink, appearing to read "Daphne W. Ntiri".

—
Daphne W. Ntiri

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